

June 19, 2017

**VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Room TW-A325  
Washington, DC 20554

RE: **Panhandle Telecommunication Systems, Inc., SAC 439032**  
**Submission of FCC Form 481 Annual Report**  
**WC Docket No. 14-58 – ETC Annual Reports and Certifications**

Dear Ms. Dortch:

Panhandle Telecommunication Systems, Inc., Study Area Code 439032, hereby files its FCC Form 481 - Carrier Annual Reporting Data Collection Form in compliance with 47 C.F.R. §§54.313 and 54.422.

The FCC Form 481 has also been filed with the Universal Service Administrative Company and with the relevant state commissions and Tribal governments, as appropriate.

Please contact me if you have any questions.

Sincerely,



Stuart Polikoff  
Authorized Representative for  
Panhandle Telecommunication Systems, Inc.

SEP/kr

cc: Kelley Wells, Panhandle Telecommunication Systems, Inc.

**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form**FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	439032
<015>	Study Area Name	Panhandle Telecommunication Systems Inc. - CL
<020>	Program Year	2018
<030>	Contact Name: Person USAC should contact with questions about this data	Kelley Wells
<035>	Contact Telephone Number: Number of the person identified in data line <030>	5804682179 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	kelley.wells@ptci.net
	Form Type	54.313 and 54.422

<010>	Study Area Code	439032
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<210> For the prior calendar year, were there any reportable voice service outages? No

**(300) Unfulfilled Service Request  
Data Collection Form**

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&lt;300&gt; Unfulfilled service request (voice)

0

&lt;310&gt; Detail on attempts (voice)

Name of Attached Document

&lt;320&gt; Unfulfilled service request (broadband)

&lt;330&gt; Detail on attempts (broadband)

Name of Attached Document

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<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only mobile voice	
<410>	Complaints per 1000 customers for fixed voice	
<420>	Complaints per 1000 customers for mobile voice 0 . 0	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	
<440>	Complaints per 1000 customers for fixed broadband	
<450>	Complaints per 1000 customers for mobile broadband	

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<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
439032ok510.pdf		
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	
<515>	Certify compliance with applicable minimum service standards	

<b>(600) Functionality in Emergency Situations</b>		FCC Form 481
<b>Data Collection Form</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013

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<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	439032ok610.pdf





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**(800) Operating Companies  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	kelley.wells@ptci.net
<810>	Reporting Carrier	Panhandle Telecommunication Systems, Inc.
<811>	Holding Company	Panhandle Telephone Cooperative, Inc.
<812>	Operating Company	Panhandle Telecommunication Systems, Inc.

[illegible]

**(900) Tribal Lands Reporting  
Data Collection Form**

 FCC Form 481  
 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
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 <900> Does the filing entity offer tribal land services? (Y/N) Yes

&lt;910&gt; Tribal Land(s) on which ETC Serves

A portion of Panhandle Telecommunication System, Inc.'s service area -- Laverne, OK -- is a "former reservation" in Oklahoma. The Company has not been able to clearly identify the tribes associated with the former tribal land.

&lt;920&gt; Tribal Government Engagement Obligation

439032ok920.pdf

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable
Not Applicable
Not Applicable
Not Applicable
Not Applicable
Not Applicable
Not Applicable
Not Applicable
Not Applicable
Not Applicable

**(1000) Voice and Broadband Service Rate Comparability  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<1000>      Voice services rate comparability certification      Not Applicable

<1010>      Attach detailed description for voice services rate  
comparability compliance

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Name of Attached Document

<1020>      Broadband comparability certification

<1030>      Attach detailed description for broadband  
comparability compliance

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Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

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&lt;1100&gt; Certify whether terrestrial backhaul options exist (Y/N)

Yes

&lt;1130&gt; Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

**(1200) Terms and Condition for Lifeline Customers**  
**Lifeline**  
**Data Collection Form**

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439032ok1210.pdf

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- |        |                                                                                                                       |                                     |
|--------|-----------------------------------------------------------------------------------------------------------------------|-------------------------------------|
| <1221> | Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
| <1222> | Details on the number of minutes provided as part of the plan,                                                        | <input checked="" type="checkbox"/> |
| <1223> | Additional charges for toll calls, and rates for each such plan.                                                      | <input checked="" type="checkbox"/> |

**(2005) Price Cap Carrier Additional Documentation**

FCC Form 481

**Data Collection Form**

OMB Control No. 3060-0986/OMB Control No. 3060-0819

*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

July 2013

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Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

**Incremental Connect America Phase I reporting**

<p>&lt;2011&gt; 3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.</p> <p>&lt;2022&gt; Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.</p> <p>&lt;2023&gt; The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.</p> <p>&lt;2024A&gt; Round 2 Recipient of Incremental Support?</p> <p>&lt;2024B&gt; Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.</p> <p>&lt;2025A&gt; Round 2 Recipient of Incremental Support?</p> <p>&lt;2025B&gt; Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).</p> <p>&lt;2015&gt; 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)</p>	<div style="border: 1px solid black; height: 20px; width: 100px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; height: 20px; width: 100px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; height: 20px; width: 100px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; height: 20px; width: 100px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; height: 20px; width: 100px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; height: 20px; width: 100px; margin-bottom: 10px;"></div>	<div style="border: 1px solid black; height: 20px; width: 100px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; height: 20px; width: 100px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; height: 20px; width: 100px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; height: 20px; width: 100px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; height: 20px; width: 100px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; height: 20px; width: 100px; margin-bottom: 10px;"></div>
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**(2005) Price Cap Carrier Additional Documentation**

FCC Form 481

**Data Collection Form**

OMB Control No. 3060-0986/OMB Control No. 3060-0819

*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

July 2013

**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

&lt;2016&gt; Certification support used to build broadband

**Connect America Phase II Reporting {47 CFR § 54.313(e)}**

&lt;2017A&gt; Connect America Fund Phase II recipient?

&lt;2017C&gt; Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

&lt;2018&gt; Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing  
Required Information

&lt;2019&gt; Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)



**(3005) Rate Of Return Carrier Additional Documentation**  
**Data Collection Form**

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Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)	
(3010A)	Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}	
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No) <input type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No) <input type="radio"/> <input type="radio"/>
	Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:	
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	<input type="checkbox"/>
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No) <input type="radio"/> <input type="radio"/>
	If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:	
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers	<input type="checkbox"/>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.	<input type="checkbox"/>
	If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:	
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers	<input type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant	<input type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.	<input type="checkbox"/>
(3025)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information

**(3005) Rate Of Return Carrier Additional Documentation (Continued)**

FCC Form 481

**Data Collection Form**

OMB Control No. 3060-0986/OMB Control No. 3060-0819

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**Financial Data Summary**

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends

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4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

**4001.** Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

**4003a.** RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

<b>4003b.</b> Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.	Name of Attached Document Listing Required Information	_____
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------	-------

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

<b>4004a.</b> Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.	Name of Attached Document Listing Required Information	_____
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------	-------

<b>4004b.</b> Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.	Name of Attached Document Listing Required Information	_____
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**Certification - Reporting Carrier  
Data Collection Form**

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**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

<b>Certification - Agent / Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
-----------------------------------------------------------------	----------------------------------------------------------------------------------

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**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>Moss Adams LLP</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	<u>Moss Adams LLP</u>
Name of Reporting Carrier:	<u>Panhandle Telecommunication Systems Inc. - CL</u>
Signature of Authorized Officer:	<u>CERTIFIED ONLINE</u> Date: <u>06/16/2017</u>
Printed name of Authorized Officer:	<u>Shawn Hanson</u>
Title or position of Authorized Officer:	<u>CEO</u>
Telephone number of Authorized Officer:	<u>5804682180 ext.</u>
Study Area Code of Reporting Carrier:	<u>439032</u> Filing Due Date for this form: <u>07/03/2017</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	<u>Panhandle Telecommunication Systems Inc. - CL</u>
Name of Authorized Agent Firm:	<u>Moss Adams LLP</u>
Signature of Authorized Agent or Employee of Agent:	<u>CERTIFIED ONLINE</u> Date: <u>06/16/2017</u>
Name of Authorized Agent Employee:	<u>Stuart Polikoff</u>
Title or position of Authorized Agent or Employee of Agent	<u>Consulting Senior Manager</u>
Telephone number of Authorized Agent or Employee of Agent:	<u>5126527730 ext.</u>
Study Area Code of Reporting Carrier:	<u>439032</u> Filing Due Date for this form: <u>07/03/2017</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## Attachments

<b>(700) Price Offerings including Voice Rate Data</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---------------------------------------------------------------------------------------	----------------------------------------------------------------------------------

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	439032
<015>	Study Area Name	Panhandle Telecommunication Systems Inc. - CL
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Kelley Wells
<035>	Contact Telephone Number - Number of person identified in data line <030>	5804682179 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kelley.wells@ptci.net

<701>	Residential Local Service Charge Effective Date	1/1/2017
<702>	Single State-wide Residential Local Service Charge	

<703>

[illegible]

<b>(800) Operating Companies</b>	FCC Form 481
<b>Data Collection Form</b>	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	439032
<015>	Study Area Name	Panhandle Telecommunication Systems Inc. - CL
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Kelley Wells
<035>	Contact Telephone Number - Number of person identified in data line <030>	5804682179 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kelley.wells@ptci.net
<810>	Reporting Carrier	Panhandle Telecommunication Systems, Inc.
<811>	Holding Company	Panhandle Telephone Cooperative, Inc.
<812>	Operating Company	Panhandle Telecommunication Systems, Inc.

[illegible]



## **LINE 510 - SERVICE QUALITY STANDARDS AND CONSUMER PROTECTION RULES COMPLIANCE**

Panhandle Telecommunication Systems, Inc. (“the Company”) complies with applicable service quality standards and consumer protection rules for its voice and broadband services.

The Company is a mobile wireless provider that received its designation as an eligible telecommunications carrier (“ETC”) from the Oklahoma Corporation Commission (“OCC”). The Company is bound by the requirements of OAC 165:55-23-1 *et seq.* which pertains to the provision of supported services by designated wireless carriers. The rules address, among other things, content of bills, billing disputes, minimum service standards, responsibility for adequate and safe service, records of trouble reports, and response to customer complaint inquiries.

The Company complies with the FCC’s Open Internet rules, 47 C.F.R. §§8.3-8.11. These rules prohibit blocking, throttling, and paid prioritization, and also require the Company to publicly disclose information regarding its network management practices, performance, and the commercial terms of its broadband services.

The Company complies with any and all consumer protection obligations under state law.

The Company also complies with the CTIA Consumer Code for Wireless Service. Specifically: (1) the Company discloses its rates and terms of service to customers; (2) the Company makes available maps showing where service is generally available; (3) the Company provides contract terms to customers and confirms changes in service; (4) the Company allows a trial period for new service; (5) the Company provides specific disclosures in its advertising; (6) the Company separately identifies carrier charges from taxes on its billing statements; (7) the Company provides customers the right to terminate service for changes to contract terms; (8) the Company provides ready access to customer service; (9) the Company promptly responds to consumer inquiries and complaints received from government agencies; and (10) the Company abides by policies for protection of consumer privacy.

Finally, the Company has a policy and established operating procedures that comply with the FCC’s Customer Proprietary Network Information (CPNI) rules (47 C.F.R. §§64.2001-64.2011).

## **LINE 610 - ABILITY TO FUNCTION IN EMERGENCY SITUATIONS**

Panhandle Telecommunication Systems, Inc. (“the Company”) is able to function in emergency situations for both voice and broadband service. The Company has a reasonable amount of back-up power to ensure functionality without an external power source. The Company’s network is reinforced by battery back-ups installed at its cell sites and generators at its mobile telephone switching office. The Company also has numerous portable generators that are available to be moved to any of the cell sites. In addition, the cell sites are constantly monitored by the switch which alerts the answering service dispatch in the event trouble is detected. The network is capable of managing traffic spikes resulting from emergency situations.

The Company is able to reroute traffic around damaged facilities. Although the Company’s ability to reroute traffic around damaged facilities is not absolute and may be limited in certain circumstances, there is a restoration plan in place for expeditious recovery of service, including splicing of damaged facilities when warranted.

## **LINE 920 – TRIBAL GOVERNMENT ENGAGEMENT OBLIGATION**

The service area of Panhandle Telecommunication Systems, Inc. (“the Company”) includes “former reservations” in Oklahoma. The Company was unable to clearly identify the tribes associated with the former tribal land served and sent letters on October 14, 2016 via certified mail, “return receipt requested,” to all of the tribes in Oklahoma as listed below. The letters were addressed to the contacts as provided by the National Congress of American Indian's Tribal directory. Each letter requested that the Tribal government representative contact the Company to engage in discussions or acknowledge that they have no tribal interest in the Company's service area and decline to engage in discussions. Following is the status of the attempted contacts.

Jicarilla Apache Nation - A signed receipt was received on October 20, 2016. By the end of 2016, the Company had not been contacted by any representative of the Tribal government.

Comanche Nation – A signed receipt was received on October 17, 2016. By the end of 2016, the Company had not been contacted by any representative of the Tribal government.

United Keetoowah Band of Cherokee Indians - A signed receipt was received on October 17, 2016. By the end of 2016, the Company had not been contacted by any representative of the Tribal government.

Cheyenne and Arapaho Tribes - A signed receipt was received on October 19, 2016. By the end of 2016, the Company had not been contacted by any representative of the Tribal government.

Kiowa Tribe of Oklahoma - A signed receipt was received on October 17, 2016. By the end of 2016, the Company had not been contacted by any representative of the Tribal government.

Attached are the letters that were sent to each of the Tribal governments.



## Panhandle Telecommunication Systems, Inc.

SHAWN HANSON  
Chief Executive Officer

October 14, 2016

Amber C. Toppah, Chairman  
Kiowa Tribe of Oklahoma  
PO Box 369  
Carnegie, OK 73105 73015

Re: Federal Communications Commission mandate for Tribal Consultations

Dear Chairman Toppah:

As you may be aware, the FCC has issued a new rule requiring telecommunication service providers to engage with Tribal governments if the company provides service on Tribal lands. "Tribal lands" are defined as *"any federally recognized Indian Tribe's reservations, pueblo or colony, including former reservations in Oklahoma"*. On behalf of Panhandle Telecommunication Systems, Inc. we want to make sure that the communications needs of your Tribal members and all institutions operated by your Nation are met. In order to accomplish this, I would like to arrange a meeting with you or others you may designate to discuss needs and assessment and deployment planning for the communication needs of your Tribal members and Tribal government institutions. Panhandle Telecommunication Systems, Inc.'s service area consists of Cimarron, Texas and Beaver counties in the Oklahoma Panhandle, and a small portion of western Harper and far northeast Ellis counties. I am uncertain as to the Kiowa Tribe's interest regarding our service area, and would like to confirm your desire to participate with us in this engagement process. To assist you in making this decision, I have attached a map of our service area. Should your area of interest include our service area, I would like to discuss, at a minimum, the following:

1. The communication needs of Tribal community anchor institutions
2. Feasibility and sustainability planning for your communication needs
3. Marketing of our services to Tribal members
4. Rights of way issues, if any, associated with our provisioning of services to Tribal members and/or institutions operated by the Nation
5. Our compliance with Tribal business and licensing requirements, if any
6. Other items you wish to discuss.

I would like to schedule a meeting at your earliest convenience. Please contact me at the below phone number or email address so we can select the time and location that best fits your schedule.

Alternatively, if you feel you have no Tribal interests in our service area, I've included a letter to that effect and a return envelope which you may use to communicate that decision to us. Or, if you prefer, you could choose to contact us via the contact information below:

Contact information:

Travis Clark

P. O. Box 1188

Guymon, OK 73942

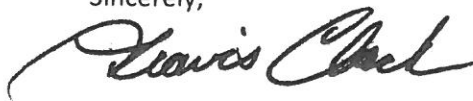
Email: [travis.clark@ptci.net](mailto:travis.clark@ptci.net)

Phone: 580-468-2307

Mobile: 580-651-3880

Fax: 580-468-3799

Sincerely,

A handwritten signature in black ink that reads "Travis Clark". The signature is fluid and cursive, with the first name "Travis" being more prominent than the last name "Clark".

Travis Clark  
Plant Manager

GB:kl

cc: Shawn Hanson  
CEO  
Panhandle Telecommunication Systems, Inc.

Travis Clark  
Plant Manager  
PTCI/PTSI  
PO Box 1188  
Guymon, OK 73942

Dear Mr. Clark:

This document will serve to notify Panhandle Telecommunication Systems, Inc. that the Kiowa Tribe has no Tribal interest in Panhandle's Service area and as such, decline to engage in a discussion of our Tribal communication needs.

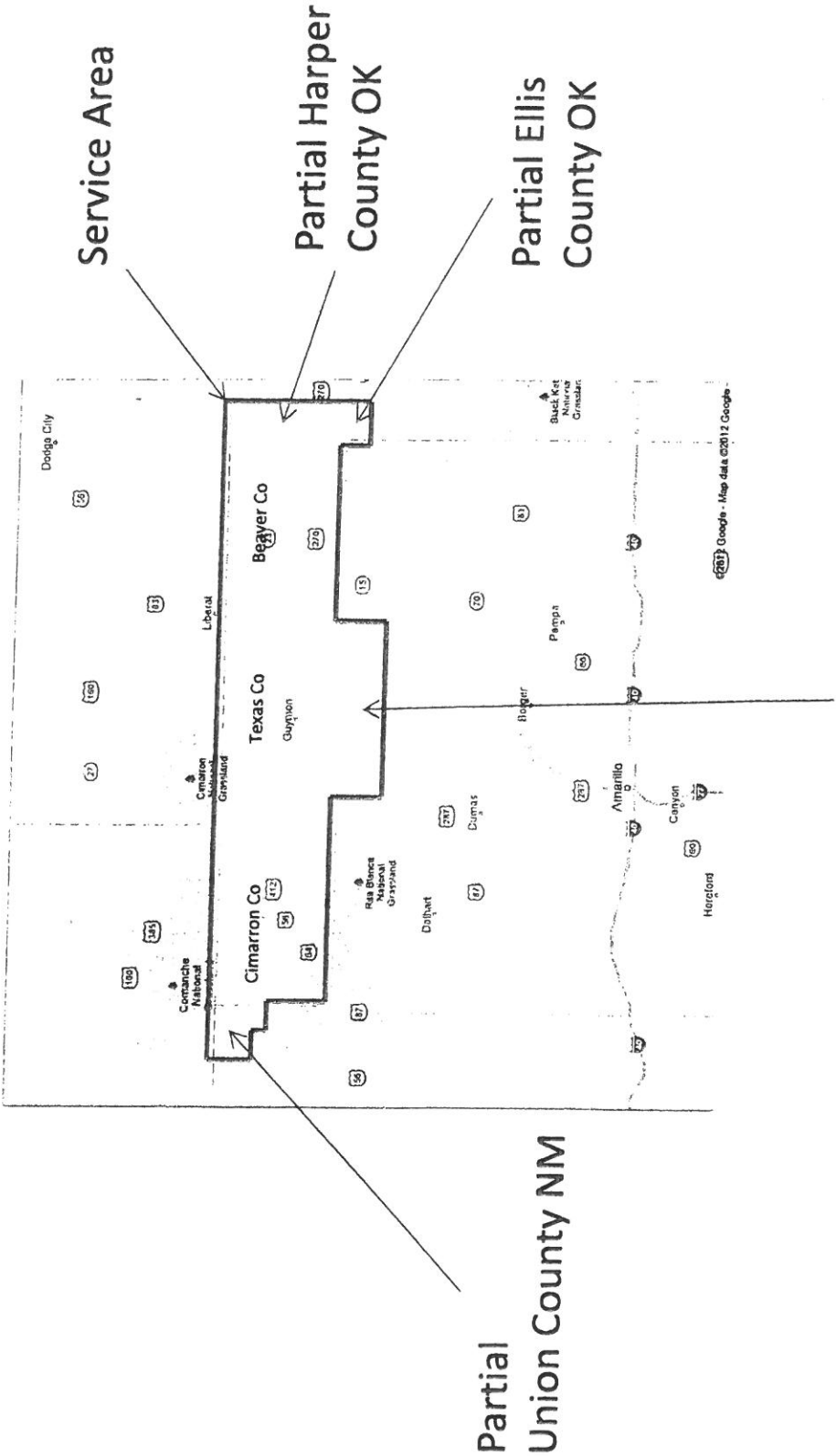
Signature \_\_\_\_\_

Title \_\_\_\_\_

Date \_\_\_\_\_

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And Hansford Counties TX



## Panhandle Telecommunication Systems, Inc.

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SHAWN HANSON  
Chief Executive Officer

October 14, 2016

Wallace Coffey  
Chairman  
Comanche Nation  
P. O. Box 908  
Lawton, OK 73502

Re: Federal Communications Commission mandate for Tribal Consultations

Dear Chairman Coffey:

As you may be aware, the FCC has issued a new rule requiring telecommunication service providers to engage with Tribal governments if the company provides service on Tribal lands. "Tribal lands" are defined as *"any federally recognized Indian Tribe's reservations, pueblo or colony, including former reservations in Oklahoma"*. On behalf of Panhandle Telecommunication Systems, Inc., we want to make sure that the communications needs of your Tribal members and all institutions operated by your Nation are met. In order to accomplish this, I would like to arrange a meeting with you or others you may designate to discuss needs and assessment and deployment planning for the communication needs of your Tribal members and Tribal government institutions. Panhandle Telecommunication Systems, Inc.'s service area consists of Cimarron, Texas and Beaver counties in the Oklahoma Panhandle, and a small portion of western Harper and far northeast Ellis counties. I am uncertain as to the Comanche Nation's interest regarding our service area, and would like to confirm your desire to participate with us in this engagement process. To assist you in making this decision, I have attached a map of our service area. Should your area of interest include our service area, I would like to discuss, at a minimum, the following:

1. The communication needs of Tribal community anchor institutions
2. Feasibility and sustainability planning for your communication needs
3. Marketing of our services to Tribal members
4. Rights of way issues, if any, associated with our provisioning of services to Tribal members and/or institutions operated by the Nation
5. Our compliance with Tribal business and licensing requirements, if any
6. Other items you wish to discuss.

I would like to schedule a meeting at your earliest convenience. Please contact me at the below phone number or email address so we can select the time and location that best fits your schedule.



Alternatively, if you feel you have no Tribal interests in our service area, I've included a letter to that effect and a return envelope which you may use to communicate that decision to us. Or, if you prefer, you could choose to contact us via the contact information below:

Contact information:

Travis Clark

P. O. Box 1188

Guymon, OK 73942

Email: [travis.clark@ptci.net](mailto:travis.clark@ptci.net)

Phone: 580-468-2307

Mobile: 580-651-3880

Fax: 580-468-3799

Sincerely,

A handwritten signature in black ink that reads "Travis Clark". The signature is fluid and cursive, with the first name "Travis" being more prominent than the last name "Clark".

Travis Clark  
Plant Manager

TC:kb

cc: Shawn Hanson  
CEO  
Panhandle Telecommunication Systems, Inc.

Travis Clark  
Plant Manager  
PTCI/PTSI  
PO Box 1188  
Guymon, OK 73942

Dear Mr. Clark:

This document will serve to notify Panhandle Telephone Cooperative, Inc. that the Comanche Nation has no Tribal interest in Panhandle's Service area and as such, decline to engage in a discussion of our Tribal communication needs.

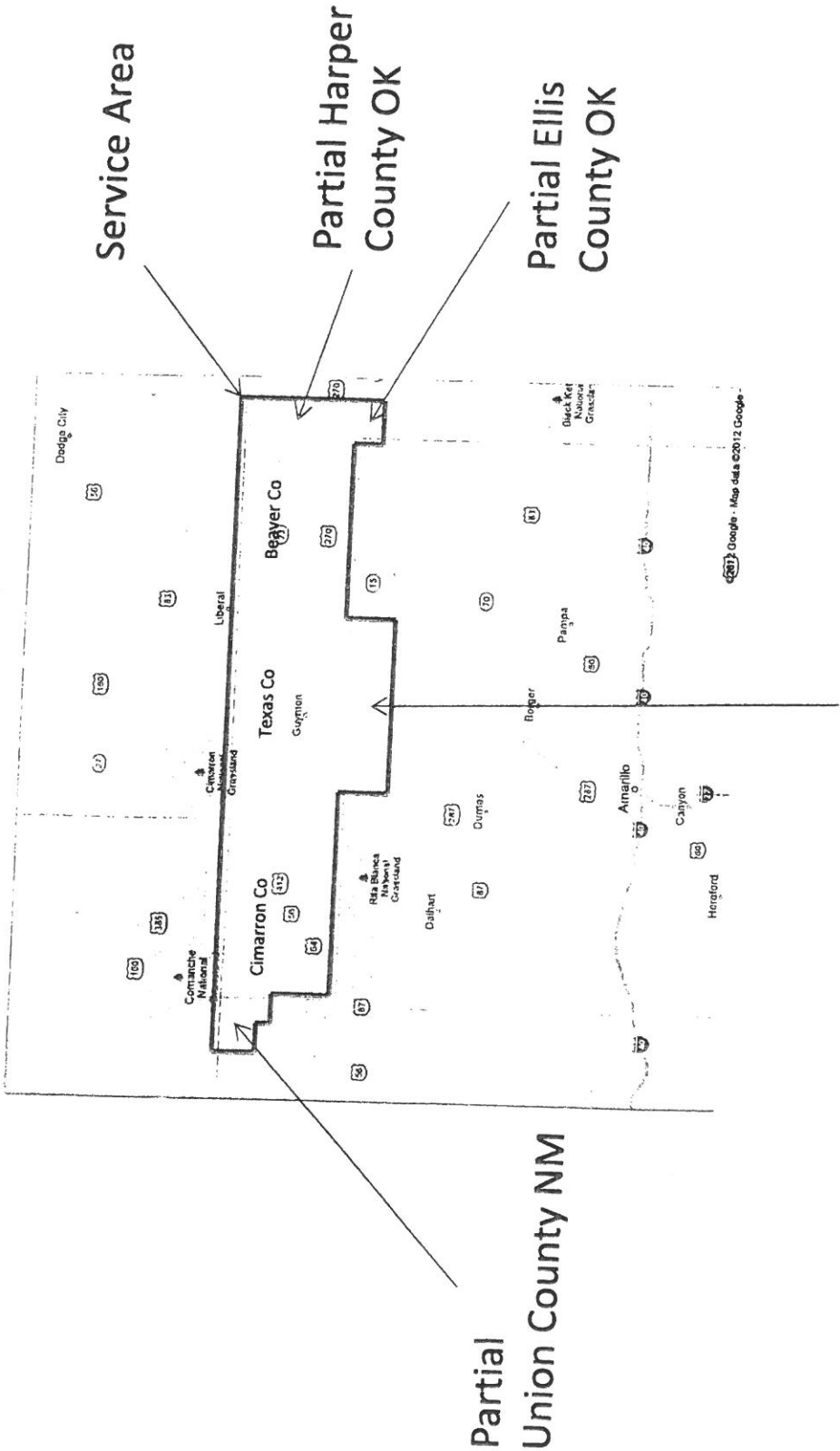
Signature \_\_\_\_\_

Title \_\_\_\_\_

Date \_\_\_\_\_

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# Partial Sherman And Hansford Counties TX



## Panhandle Telecommunication Systems, Inc.

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SHAWN HANSON  
Chief Executive Officer

October 14, 2016

George Wickliffe  
Chief  
United Keetoowah Band of Cherokee Indians  
P. O. Box 746  
Tahlequah, OK 74465

Re: Federal Communications Commission mandate for Tribal Consultations

Dear Chief Wickliffe:

As you may be aware, the FCC has issued a new rule requiring telecommunication service providers to engage with Tribal governments if the company provides service on Tribal lands. "Tribal lands" are defined as *"any federally recognized Indian Tribe's reservations, pueblo or colony, including former reservations in Oklahoma"*. On behalf of Panhandle Telecommunication Systems, Inc., we want to make sure that the communications needs of your Tribal members and all institutions operated by your Nation are met. In order to accomplish this, I would like to arrange a meeting with you or others you may designate to discuss needs and assessment and deployment planning for the communication needs of your Tribal members and Tribal government institutions. Panhandle Telecommunication Systems, Inc.'s service area consists of Cimarron, Texas and Beaver counties in the Oklahoma Panhandle, and a small portion of western Harper and far northeast Ellis counties. I am uncertain as to the United Keetoowah Band's interest regarding our service area, and would like to confirm your desire to participate with us in this engagement process. To assist you in making this decision, I have attached a map of our service area. Should your area of interest include our service area, I would like to discuss, at a minimum, the following:

1. The communication needs of Tribal community anchor institutions
2. Feasibility and sustainability planning for your communication needs
3. Marketing of our services to Tribal members
4. Rights of way issues, if any, associated with our provisioning of services to Tribal members and/or institutions operated by the Nation
5. Our compliance with Tribal business and licensing requirements, if any
6. Other items you wish to discuss.

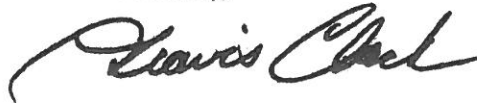
I would like to schedule a meeting at your earliest convenience. Please contact me at the below phone number or email address so we can select the time and location that best fits your schedule.

Alternatively, if you feel you have no Tribal interests in our service area, I've included a letter to that effect and a return envelope which you may use to communicate that decision to us. Or, if you prefer, you could choose to contact us via the contact information below:

Contact information:

Travis Clark  
P. O. Box 1188  
Guymon, OK 73942  
Email: [travis.clark@ptci.net](mailto:travis.clark@ptci.net)  
Phone: 580-468-2307  
Mobile: 580-651-3880  
Fax: 580-468-3799

Sincerely,

A handwritten signature in black ink that reads "Travis Clark". The signature is fluid and cursive, with the first name "Travis" being more prominent than the last name "Clark".

Travis Clark  
Plant Manager

TC:kl

cc: Shawn Hanson  
CEO  
Panhandle Telecommunication Systems, Inc.

Travis Clark  
Plant Manager  
PTCI/PTSI  
PO Box 1188  
Guymon, OK 73942

Dear Mr. Clark:

This document will serve to notify Panhandle Telephone Cooperative, Inc. that the United Keetoowah Band of Cherokee Indians have no Tribal interest in Panhandle's Service area and as such, decline to engage in a discussion of our Tribal communication needs.

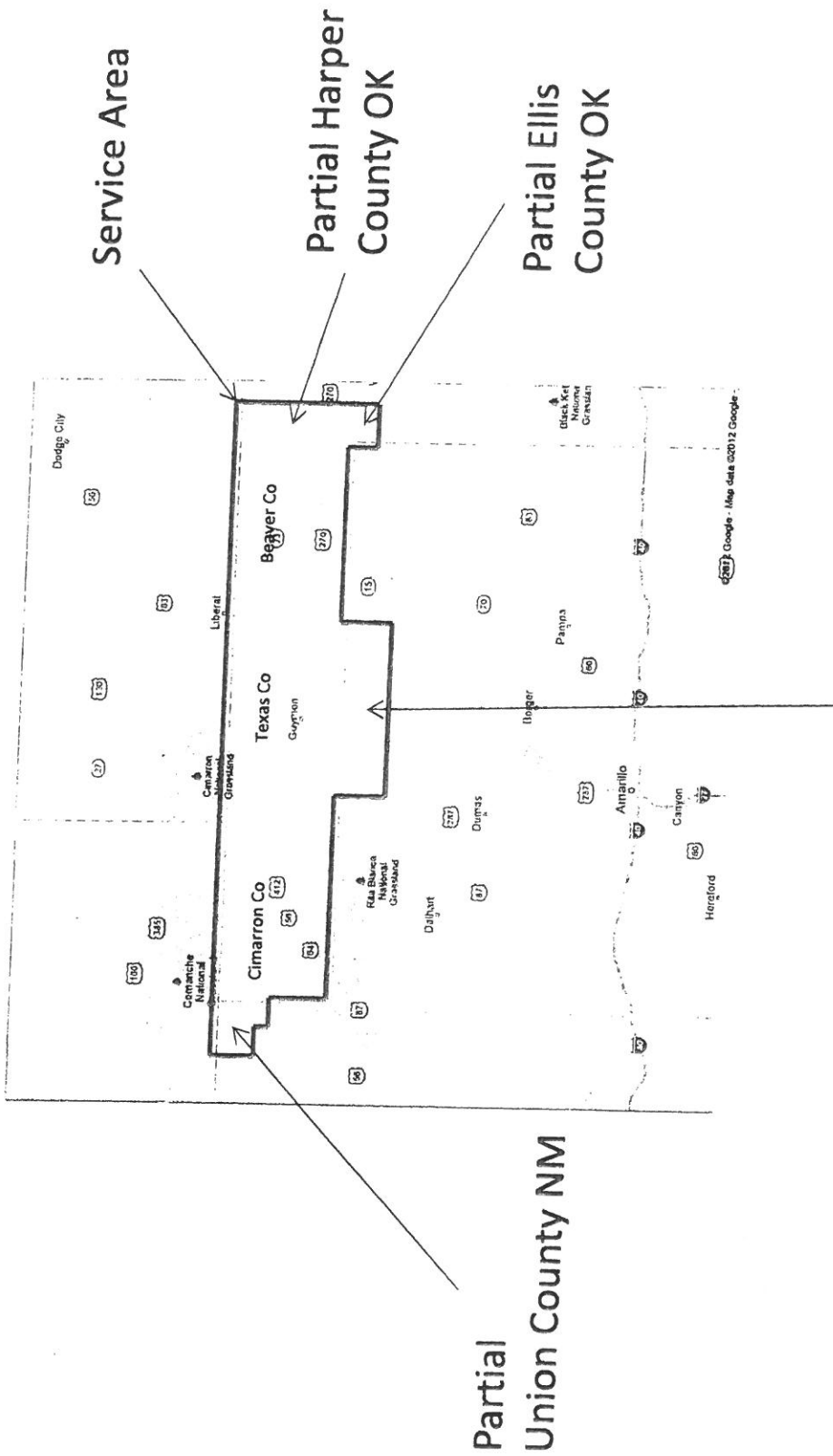
Signature \_\_\_\_\_

Title \_\_\_\_\_

Date \_\_\_\_\_

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## Panhandle Telecommunication Systems, Inc.

---

SHAWN HANSON  
Chief Executive Officer

October 14, 2016

Ty Vicenti  
President  
Jicarilla Apache Nation  
P. O. Box 507  
Dulce, NM 87528

Re: Federal Communications Commission mandate for Tribal Consultations

Dear President Vicenti:

As you may be aware, the FCC has issued a new rule requiring telecommunication service providers to engage with Tribal governments if the company provides service on Tribal lands. "Tribal lands" are defined as *"any federally recognized Indian Tribe's reservations, pueblo or colony, including former reservations in Oklahoma"*. On behalf of Panhandle Telecommunication Systems, Inc., we want to make sure that the communications needs of your Tribal members and all institutions operated by your Nation are met. In order to accomplish this, I would like to arrange a meeting with you or others you may designate to discuss needs and assessment and deployment planning for the communication needs of your Tribal members and Tribal government institutions. Panhandle Telecommunication Systems, Inc.'s service area consists of Cimarron, Texas and Beaver counties in the Oklahoma Panhandle, and a small portion of far eastern Union County, New Mexico. I am uncertain as to the Jicarilla Apache Nation's interest regarding our service area, and would like to confirm your desire to participate with us in this engagement process. To assist you in making this decision, I have attached a map of our service area. Should your area of interest include our service area, I would like to discuss, at a minimum, the following:

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2. Feasibility and sustainability planning for your communication needs
3. Marketing of our services to Tribal members
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Travis Clark

P. O. Box 1188

Guymon, OK 73942

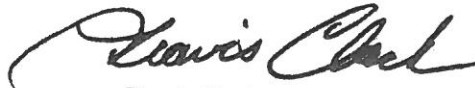
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Mobile: 580-651-3880

Fax: 580-468-3799

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Travis Clark  
Plant Manager

TC:kb

cc: Shawn Hanson  
CEO  
Panhandle Telecommunication Systems, Inc.

Travis Clark  
Plant Manager  
PTCI/PTSI  
PO Box 1188  
Guymon, OK 73942

Dear Mr. Clark:

This document will serve to notify Panhandle Telecommunication Systems, Inc. that the Jicarilla Apache Nation has no Tribal interest in Panhandle's Service area and as such, decline to engage in a discussion of our Tribal communication needs.

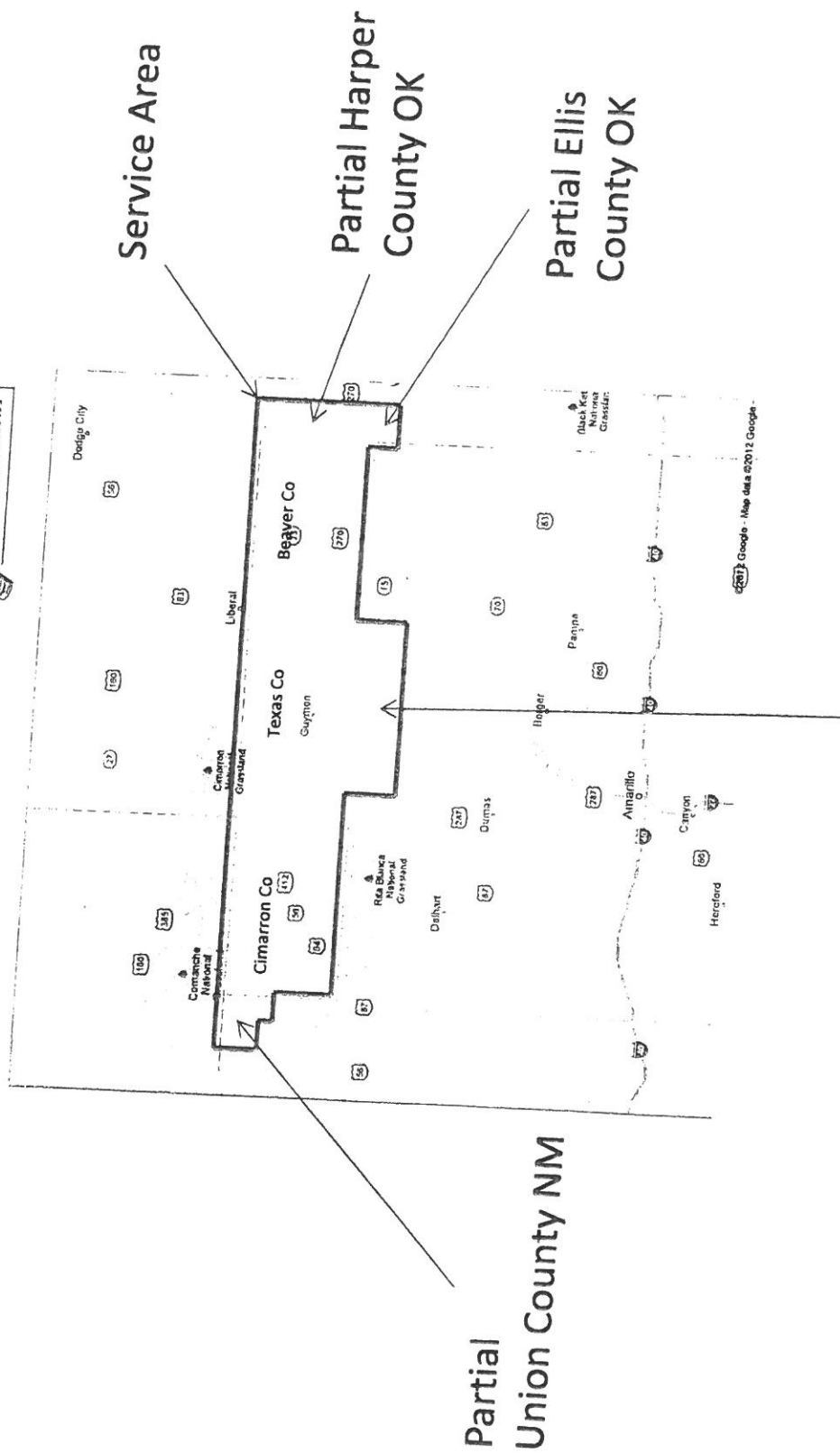
Signature \_\_\_\_\_

Title \_\_\_\_\_

Date \_\_\_\_\_

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Partial Sherman  
And Hansford Counties TX



## Panhandle Telecommunication Systems, Inc.

SHAWN HANSON  
Chief Executive Officer

October 14, 2016

Eddie Hamilton  
Governor  
Cheyenne and Arapaho Tribes  
Box 167  
Concho, OK 73022

Re: Federal Communications Commission mandate for Tribal Consultations

Dear Governor Hamilton:

As you may be aware, the FCC has issued a new rule requiring telecommunication service providers to engage with Tribal governments if the company provides service on Tribal lands. "Tribal lands" are defined as *"any federally recognized Indian Tribe's reservations, pueblo or colony, including former reservations in Oklahoma"*. On behalf of Panhandle Telecommunication Systems, Inc., we want to make sure that the communications needs of your Tribal members and all institutions operated by your Nation are met. In order to accomplish this, I would like to arrange a meeting with you or others you may designate to discuss needs and assessment and deployment planning for the communication needs of your Tribal members and Tribal government institutions. Panhandle Telecommunication Systems, Inc.'s service area consists of Cimarron, Texas and Beaver counties in the Oklahoma Panhandle, and a small portion of western Harper and far northeast Ellis counties. I am uncertain as to the Cheyenne and Arapaho Tribe's interest regarding our service area, and would like to confirm your desire to participate with us in this engagement process. To assist you in making this decision, I have attached a map of our service area. Should your area of interest include our service area, I would like to discuss, at a minimum, the following:

1. The communication needs of Tribal community anchor institutions
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Travis Clark

P. O. Box 1188

Guymon, OK 73942

Email: [travis.clark@ptci.net](mailto:travis.clark@ptci.net)

Phone: 580-468-2307

Mobile: 580-651-3880

Fax: 580-468-3799

Sincerely,

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Travis Clark  
Plant Manager

TC:kl

cc: Shawn Hanson  
CEO  
Panhandle Telecommunication Systems, Inc.

Travis Clark  
Plant Manager  
PTCI/PTSI  
PO Box 1188  
Guymon, OK 73942

Dear Mr. Clark:

This document will serve to notify Panhandle Telecommunication Systems, Inc. that the Cheyenne – Arapaho Tribes have no Tribal interest in Panhandle's Service area and as such, decline to engage in a discussion of our Tribal communication needs.

Signature \_\_\_\_\_

Title \_\_\_\_\_

Date \_\_\_\_\_



## **LINE 1210 – TERMS & CONDITIONS OF VOICE TELEPHONY LIFELINE PLANS**

Residential customers of Panhandle Telecommunication Systems, Inc. (“the Company”) residing in the Company’s Tribal exchange in Oklahoma who qualify for the Lifeline Program receive a discount of \$20.00 on voice telephony service (\$9.25 federal discount + \$10.75 additional federal discount).

In the Company’s Tribal exchange – Laverne – the Lifeline single-line residential rate is \$0.00 (\$20.00 standard rate - \$20.00 discount).

Lifeline customers have an unlimited number of minutes for local and domestic long distance calls and unlimited texting.

Lifeline customers in the Company’s Tribal exchange may also apply their discount to a service plan that includes unlimited voice and text to Mexico. The Lifeline discounted rate for this plan is \$15.00 (\$35.00 standard rate - \$20.00 discount).

Data usage is not included in the above-mentioned voice Lifeline offerings. Tribal Lifeline customers may subscribe to any residential voice telephony service package that is generally available to the public and will receive the applicable Lifeline discount off of the regular price of the package.

Additional information regarding the terms and conditions of voice telephony Lifeline plans can be found at <http://www.ptci.net/wireless/plans-options/>